

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE:

APPLICATION OF LOUDMILA  
BOURLAKOVA AND VERONICA  
BOURLAKOVA TO TAKE DISCOVERY  
FOR USE IN A FOREIGN PROCEEDING  
PURSUANT TO 28 U.S.C. § 1782

Case No. 1:24-mc-00071

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that upon the Declaration of Nicole A. Sullivan dated March 22, 2024 with accompanying exhibits and the accompanying memorandum of law, Nikolai Kazakov (“Nikolai”) and Vera Kazakov (“Vera”) (collectively the “Kazakovs”), will move this Court before the Honorable J. Paul Oetken, United States District Judge, United States Courthouse, located at 40 Foley Square, New York, New York 10007, Courtroom 706 at a date and time to be set by the Court for an order (1) permitting the Kazakovs to intervene pursuant to Fed. R. Civ. P. 24(a) and/or 24(b); (2) vacating the Order granting the Petitioners’ Application under 28 U.S.C. § 1782 pursuant to Fed. R. Civ. P. 60; (3) quashing the subpoena pursuant to Fed. R. Civ. P. 45; and (3) granting such other and further relief as this Court may deem appropriate.

Dated: March 25, 2024

Respectfully submitted,



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